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February 22, 2024

Via ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York 500 Pearl Street
500 Pearl Street
New York, NY 10007

Re: *Multisuma Investment Corp. et al v. The Bolivarian Republic of Venezuela*
Case No. 23-cv-09670

Dear Judge Castel:

We represent plaintiffs Multisuma Investment Corp. and Cen Xijiao Siem Wu (collectively, “Plaintiffs”) in the above-referenced case. The initial pre-trial conference is scheduled for Monday, March 4, 2024, but as set forth below, to the best of our knowledge, service of the summons and complaint is in process but has not yet been completed. Accordingly, we respectfully request that the initial pre-trial conference be stayed until service of process is complete.

On December 19, 2023, the Court approved Plaintiffs’ request to serve defendant, The Bolivarian Republic of Venezuela (“Defendant”), via diplomatic channels pursuant to 28 U.S.C. § 1608(a)(4). We prepared the necessary materials for service upon Defendant, and we submitted those materials to the Clerk of Court in accordance with Section 1608(a)(4) of the Foreign Sovereign Immunities Act.

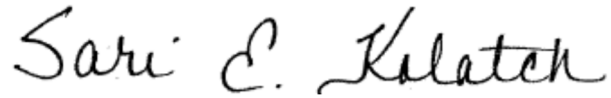
The Clerk successfully transmitted those documents to the United States Department of State on January 9, 2024, as attested to in the Clerk’s Certificate of Mailing (Dkt. 9). However, we have not yet received any update on service from the Department of State. Once the Department of State transmits the document via diplomatic channels, it is required to send the Clerk of Court a diplomatic note indicating when the papers were transmitted.

We have attempted to contact the relevant office (the Office of Policy Review and Inter-Agency Liaison) and have not yet received a response.

We will continue to make efforts to contact the Department of State and update the Court as soon as we have any new information. In a similar case in this District against Defendant, the

docket reflects that it took over eight months, from the time the Clerk transmitted the documents, until the Department of State transmitted the documents to Defendant via diplomatic channels and provided the required confirmation.

Respectfully submitted,

A handwritten signature in black ink, reading "Sari E. Kolatch". The signature is written in a cursive, flowing style.

Sari E. Kolatch